UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

Plaintiff,

Case No. 10-CR-00654 (HB)

CAROLLO, ET AL.,

C 1 .

Defendants : -----X

v.

## **DANIEL NAEH'S NOTICE OF MOTION TO QUASH**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law and Declaration of Susan Hoffinger, dated March 9, 2012, Non-Party Daniel Nach, by and through his counsel, will move this Court at such time as the Court designates, before the Honorable Harold Baer, United States District Judge, at the United States Courthouse for the Southern District of New York, located at 500 Pearl Street, New York, New York, at a time and date to be set by the Court for an Order pursuant to Federal Rule of Criminal Procedure 17(c)(2) quashing defendant Steven E. Goldberg's second subpoena served upon Mr. Nach on March 1, 2012, and such other relief as the Court deems just and proper.

Dated: March 9, 2012

New York, New York

Respectfully submitted,

HOFFINGER-STERN & ROSS LLP

By:

Susan Hoffinger, Esq.

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Attorney for Non-Party Daniel Naeh